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April 10, 2025

Via ECF Filing

The Hon. Nina R. Morrison
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

In Re: Semencic v County of Nassau, et al.
Case No.: 2:18-cv-05244 (NRM)(AYS)

Your Honor:

As you know, on March 19, 2025, plaintiff moved for an award of attorney's fees in this case. *See* ECF Doc. # 122. On April 2, 2025, the defendants filed their opposition papers. *See* ECF Doc. # 126. I am aware that, pursuant to the Court's local rules, my reply papers were due yesterday, April 9, 2025.

I was unable to meet this deadline due to my wife's medical condition. Rachel suffers from chronic and severe degenerative disc disease, and she experienced an unexpected exacerbation of that condition yesterday. Her condition was debilitating, and required my attention throughout the day to drive her to her pain specialist, pick up her prescriptions and provide basic care for her into the evening. These demands required my full attention and prevented me from filing my reply on time.

I humbly apologize to the Court and opposing counsel for this delay, and ask the Court to accept the filing of my reply papers (made concurrently herewith) out of time.

Thank you very much for your consideration.

Respectfully Submitted,

The Law Office of Brian T. Stapleton, Esq.

Brian T. Stapleton

By: Brian T. Stapleton, Esq.

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April 10, 2025
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BTS/ma

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